

JOHN RITCHIE)	
)	
Plaintiff,)	Cause No. 2:19-cv-04216-BCW
)	
v.)	
)	
MISSOURI DEPARTMENT OF)	
CORRECTIONS, et al.,)	
)	
Defendants.)	

Pursuant to the Court’s December 30, 2019 Order (Doc. No. 5), the parties convened for their Rule 26(f) conference on January 9, 2020, and now submit the following Joint Proposed Scheduling Plan:

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- c. The parties shall exchange Fed. R. Civ. P. Rule 26(a)(1) disclosures no later than **February 21, 2020**.
- d. Discovery will not be conducted in phases or limited to certain issues.
- e. The presumptive limits of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A) will not be sufficient due to the number of important fact witnesses. The parties stipulate to fifteen (15) depositions. The presumptive limit of twenty-five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a) should apply in this case.
- f. Plaintiffs' retained expert witnesses and reports as well as 26(a)(2)(C) summaries from non-retained expert witnesses shall be disclosed no later than **September 28, 2020**; Plaintiffs' expert witnesses shall be made available for deposition no later than **November 15, 2020**. Defendants' experts and reports as well as 26(a)(2)(C) summaries from non-retained expert witnesses shall be disclosed no later than **January 14, 2021**; Defendants' expert witnesses shall be made available for deposition no later than **March 1, 2021**. Rebuttal experts and reports shall be provided no later than **April 1, 2021**. Rebuttal experts shall be made available for deposition no later than **May 3, 2021**.
- g. If physical examinations of Plaintiff are requested, the requests shall be made no later than **July 24, 2020**, and the examinations shall be completed no later than **September 25, 2020**.
- h. All discovery will be completed no later than **May 3, 2021**. The parties acknowledge that this deadline would provide more than 180 days to complete discovery. Pursuant to Local Rule 26.1, the parties submit that this

deadline accounts for what the parties agree will be time-consuming discovery, given the complexity of the issues and number of fact and expert witnesses anticipated.

- i. All motions to compel discovery must be filed no later than **May 14, 2021**.
- j. Any *Daubert* motions will be filed no later than **May 28, 2021**.
- 3. All dispositive motions shall be filed no later than **June 14, 2021**.
- 4. The earliest possible date by which this case should reasonably be expected to be ready for trial is **October 25, 2021**.
- 5. The parties anticipate a jury trial of no more than one week, but each party reserves the right to modify the number of trial days anticipated based on discovery to be conducted in this case.

Respectfully submitted,

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